

# The Law Firm of Leonard J. French

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January 28, 2020

**MEMO ENDORSED**

**VIA ECF**

Honorable Valerie Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, New York 10007

USDC SDNY  
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Re: Take-Two Interactive Software Inc., v. Wyckoff et al  
No. 1:19-cv-11818-VEC

Dear Judge Caproni,

I am counsel for Defendant, Johnathan Wyckoff. Defendant respectfully submits this letter with Plaintiff Take-Two Interactive Software, Inc.'s consent in accordance with Your Honor's Rules for Individual Practices in Civil Cases, paragraphs 3(A) & 2(C), to request that I, defense counsel, be allowed to appear telephonically at the February 7, 2020, Initial Pre-Trial Conference. In the alternative, the Parties request a 28-day adjournment of the Initial Pre-Trial Conference to Friday, March 6, 2020. This is my first request for an extension of time for the Initial Pre-Trial Conference. Take-Two consents to this request.

I make this request because I am representing the Defendant Pro Bono and I'm currently abroad in Europe on a previously scheduled trip where I proposed to my fiancé who lives and works in Luxembourg. I had planned to stay through her February work holiday, returning February 24, 2020. Rescheduling my flight or booking a new itinerary would come at significant personal expense. The parties are actively working toward resolving the matter.

Thank the court for your time and consideration in this matter.

Application GRANTED. The initial pretrial conference is adjourned to **March 6, 2020**. The parties' joint submission is due **February 27, 2020**.

SO ORDERED.



1/28/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

CC: All Counsel of Record via CM/ECF

Respectfully submitted,

/s/ Leonard J. French

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